

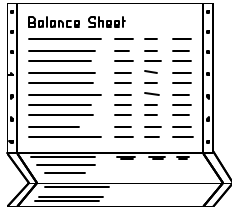


Department of Conservation
Division of Recycling
Certification Services Branch
Recycler Training & Review

Recycler Copy

The 12 Most Common Errors Made By Recyclers

RECORDKEEPING REQUIREMENTS



1. Daily Summary Requirements

Recycling Centers are not preparing and retaining daily summaries of all receipt and log transactions, including donations, for each shipping report. Daily summaries must contain the TOTAL WEIGHT and the corresponding REFUND VALUE for EACH DAY of the shipping report period. Many recycling centers are showing the total paid for the day but not the TOTAL REFUND VALUE paid for the day.

2. Receipt and Log Requirements

Recycling Centers are not preparing and maintaining copies of press pre-numbered receipts or receipts produced by a computer, that cannot be altered, for any purchase or donation of containers in the amount of fifty dollars (\$50.00) or more in refund value.

When receipts are prepared, many recyclers have not included one or more of the following requirements (Excerpts of 14CCR, Section 2525(a)(1-7)):

- The basis for refund value payment (e.g., segregated and counted, segregated and weighed, commingled, or, if no refund value is paid, indicate scrap only);
- The certification number (RC#) of the recycling center;
- The printed name and signature of the person selling or donating the material, or a statement explaining why such could not be obtained; (a suggestion is for the recycling center attendant to print the name of the consumer, and then have the consumer sign their name).
- Extra information identifying the person selling or donating the material for purchases or donations in which the refund value is \$50.00 or more. The extra information shall be either: the person's valid driver license number and state of issuance or vehicle license number and state of issuance. If those are not available, a California Identification Card number may be substituted. If the consumer does not have any of these items of identification, the recycler is required to explain why the extra information could not be obtained.

- For purchases or donations with a total refund value of less than fifty dollars (\$50.00), recycling centers may use logs instead of receipts. When using logs, recycling centers on many occasions have not included the basis and the printed name and signature. Extra identification is not required when total refund value is less than \$50.00.

RECORDKEEPING ACCURACY



3. Shipping Reports not Based on Receipts and Logs

Recyclers have not been basing their shipping reports on their receipts and logs. Some have been using the processor's scale weight as the redemption weight which is not correct. You should determine a shipping report preparation method or methods. You may use different methods for different material types. Document your method(s). This will be helpful when employees leave or go on vacation. The key factors when preparing your shipping report are:

- (1) Determining cut-offs. It is important that clear "cutoffs" are made on the summary report, especially for those shipping reports that contain material from partial day's receipts and/or logs. A "cutoff" means the recycler writes on the daily summary report how much of the total weight received for the day is being shipped.
 - (2) Accurately summing your summaries (receipts and logs) for the period indicated.
 - (3) Accurately calculating the refund value and posting that number on the shipping report.
 - (4) Accurately calculating the redemption weight. This should be done by dividing the refund value by the segregated rate per pound for that material type.
- Remember, the shipping recycler must complete the top portion of their shipping report (DR-6) including the recycler payment request information section. This must be completed prior to delivery of the material, and must accompany the material (except for color-sorted glass).

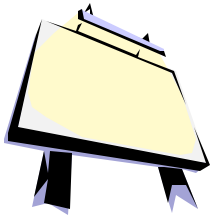
4. Applying Shrinkage

- Recyclers are not applying shrinkage correctly. Recycling Centers have the option to refuse to accept empty beverage containers which, in the opinion of the recycling center, are excessively contaminated with dirt, moisture, or other foreign substances ("shrinkage"). However, if contaminated material is accepted, the refund value rate, not the weight must be adjusted by the recycler. Some recyclers have been incorrectly adjusting the weight instead of the refund value rate.

5. Reporting Accuracy

- On numerous occasions, logs/receipts, daily summaries, and shipping reports have not been accurate. Please remember to always double check your work when summing logs, receipts, daily summaries, and shipping reports. Also, remember to include any containers purchased by count rather than weight in your records. Any purchases by count must be converted to weight at the end of the day and included in your total weight purchased for the day.

SIGNAGE



6. Posted Prices

Recycling Centers have not been posting prices for Plastics #2-#7. Recycling Centers must post refund prices for all beverage containers in the program (unless grandfathered).

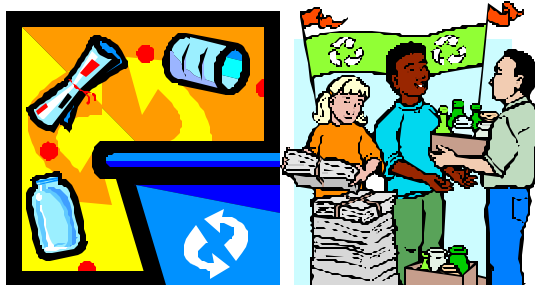
7. Signage Regarding Packaging, Contamination, and Consumer Rights

Some recyclers have not been including the following statements on their signage:

- 1) Refund is not paid for packaging, contamination such as dirt or moisture, nor beverage containers not properly labeled with the “CA Redemption Value” or “CA Cash Refund” message.
- 2) This recycler will discount the refund value, and may discount scrap value for loads of containers which include non redemption material.
- 3) The consumer has the right to:
 - a. Accept a discounted refund and/or scrap price.
 - b. Separate refund from nonrefund material.
 - c. Take material back.

This is a requirement and must be posted in a place where it can be easily seen by the consumer.

INSPECTION & PURCHASING



8. Inspection Requirements

Recyclers are not inspecting material properly. Recyclers are weighing the containers in the receptacle used by the consumer when bringing the material to the recycling center. Certified recycling centers must inspect each load of containers to determine whether the load is eligible for any refund value and, if so determine whether the load is segregated or commingled, as follows:

- The recycling center must remove the containers from any bag, box or other receptacle used to deliver the material and visually inspect the containers before determining the basis for payment and paying the customer. A certified recycling center shall never pay or claim the refund value for any material not properly inspected.
- A recommended method that is done by most recyclers is to dump the containers from the consumer's receptacle into the recycling center's receptacle, and inspect the containers as they are being dumped. This is done prior to determining the basis and weighing the containers.

9. Purchase of Materials by Count

- Some recyclers are not honoring the request of consumers to be paid by count for 50 containers or less. The consumer has the option of being paid by count or weight if they have 50 containers or less for redemption. For CRV containers of less than 24 ounces, you must pay \$0.05 for every two containers and \$0.03 for unpaired containers. For CRV containers 24 ounces or more you must pay \$0.05 per container.

10. Purchase of Redeemable Containers

- Some recyclers are not purchasing plastics #2-#7 and bimetal as required. You must purchase all beverages subject to CRV in glass, plastic, aluminum, bimetal, pet (plastic #1), HDPE (plastic #2), PVC (plastic #3), LDPE (plastic #4), PP (plastic #5), PS (plastic #6), Other (plastic #7). If you are unsure of the type of plastic, the number is on the bottom of the container.

11. Purchase of Non-CRV Containers

- When receiving glass containers from consumers, some recyclers are paying segregated rate on one color of glass and commingled rate on other colors. However, when determining the basis for payment, glass is glass. If the consumer brings green glass and flint to you, you may not pay a segregated rate for the green and a commingled rate for the flint. The commingled rate would be paid on the total weight of all the glass accepted.

NOTIFICATION REQUIREMENTS



12. Change in Hours

- Some operators of recycling centers have not notified the Division in writing when their hours of operation are not the same as when they completed their application. Recyclers must give the DOR written notice ten (10) calendar days before ANY change in hours of operation.

For additional questions contact:

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